

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Teresa Solomon,

Plaintiff,

vs.

Sensenich Trucking Company and Paul
Sambrosky,

Defendants.

Civil Action No: 3:22-cv-01178-CMC

NOTICE OF REMOVAL

Defendants Sensenich Trucking Company, LLC, incorrectly identified as Sensenich Trucking Company (“Sensenich Trucking”) and Paul Sambrosky (“Sambrosky”), hereinafter collectively (Defendants”), by and through counsel, files this Notice of Removal to the United States District Court for the District of South Carolina, Columbia Division, pursuant to 28. U.S.C. §§ 1332, 1441, and 1446.

Defendants would respectfully show this Honorable Court:

1. This action was filed by the plaintiff, Teresa Solomon (“Plaintiff”), in the Court of Common Pleas for Richland County, South Carolina, on April 1, 2022, and assigned case number 2022-CP-40-01704. A copy of the documents filed with the Court of Common Pleas for Richland County at the time of removal is attached as Exhibit A.
2. Counsel for Defendants agreed to accept service of the Summons and Complaint. Plaintiff served Defendants with the Summons and Complaint on April 5, 2022. A copy of the executed Acceptance of Service is attached as Exhibit B.
3. Plaintiff alleges she is a citizen of Richland County, South Carolina.

4. Defendant Sensenich Trucking Company, LLC is a limited liability company organized under the laws of the State of Pennsylvania with its principal place of business in the State of Pennsylvania. This is more fully articulated in the Affidavit of Shenda Sensenich as a Principal of Sensenich Trucking Company, LLC as attached as Exhibit C.

5. Defendant Paul Sambrosky is a citizen and resident of the State of Pennsylvania. This is more fully articulated in the Affidavit of Paul Sambrosky as attached as Exhibit D.

6. This action arises from a vehicular collision which occurred in Richland County, South Carolina on August 18, 2021.

7. The Complaint seeks unspecified actual and punitive damages. Defendants' counsel has been in contact with Plaintiff's counsel and are informed and believe the total amount of damages Plaintiff is seeking in this action, inclusive of all types of damages except for interest and costs, exceeds the sum of \$75,000.00.

8. The Complaint's prayer for relief does not specify a specific dollar amount of damages sought, however, based on the nature, extent, and type of injuries, losses, and damages claimed or to be claimed by Plaintiff, Defendants are informed and believe that the amount in controversy in this action exceeds \$75,000.00, exclusive of interests and costs.

9. Plaintiff's claims against Defendants are purported to exist and arise under South Carolina law.

10. This case is removable to federal court pursuant to 28 U.S.C. § 1441 as this Court has original jurisdiction over this action under 28 U.S.C. § 1332 because there is complete diversity of citizenship between the parties and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

11. Venue is proper in this Division, pursuant to Local Rule 3.01 (DSC) because the vehicular incident and a substantial part of the events or omissions giving rise to the claim occurred in this Division.

12. Defendants are filing a copy of this Notice of Removal with the Court of Common Pleas for Richland County, South Carolina, and served counsel for Plaintiff with a copy of the same.

WHEREFORE, Defendants pray this Court accept this Notice of Removal and that this Court take jurisdiction of this case and all further proceedings in this case in the Court of Common Pleas for Richland County, South Carolina, be stayed.

Respectfully submitted,
COLLINS & LACY, P.C.

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**ATTORNEYS FOR SENSENICH
TRUCKING COMPANY, LLC
INCORRECTLY IDENTIFIED AS
SENSENICH TRUCKING COMPANY
AND PAUL R. SAMBROSKY**

April 11, 2022
Columbia, South Carolina